



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION I
5 POST OFFICE SQUARE, SUITE 100
BOSTON, MASSACHUSETTS 02109-3912

**CERTIFIED MAIL
RETURN RECEIPT REQUESTED**

**URGENT LEGAL MATTER
REQUIRES PROMPT RESPONSE**

MAY 28 2015

Dennis Demers, President
Shelburne Limestone Corporation
P.O. Box 359, Essex Junction, VT 05453

Re: Clean Air Act Reporting Requirement - Follow-up

Dear Mr. Demers:

The United States Environmental Protection Agency ("EPA") is evaluating whether the facilities owned by the Shelburne Limestone Corporation ("Shelburne Limestone") are in compliance with the Clean Air Act (the "Act") and state and federal regulations promulgated under the Act. Specifically, EPA is evaluating whether Shelburne Limestone is in compliance with the National Emission Standards for Hazardous Air Pollutants found at 40 CFR Part 63, the New Source Performance Standards found at 40 CFR Part 60, as well as the federally enforceable Vermont State Implementation Plan.

Section 114(a)(1) of the Act, 42 U.S.C. § 7414(a)(1), gives EPA the authority to require any person who owns or operates any emission source to establish and maintain records, make reports, sample emissions, and provide such other information as may reasonably be required to enable EPA to determine whether such person is in compliance with the Act and its implementing regulations.

This Reporting Requirement is a follow-up to the one dated March 17, 2014. Provide all of the information outlined below within 30 days of the date Shelburne Limestone receives this letter. Provide a separate response to each numbered paragraph or subparagraph below. Where possible, provide responses in an electronic spreadsheet format (preferably Microsoft Excel). We have attached a sample spreadsheet that you may find helpful in organizing your responses.

For each facility owned or operated by Shelburne Limestone in New England:

1. If the facility has any stationary internal combustion engines (e.g., units that provide mechanical power to shredders/conveyors, units that provide primary electrical power, emergency generators), explain how each stationary internal combustion engine is used and provide the following details about each engine:
 - a. The manufacturer and model number;
 - b. The year of manufacture;
 - c. The year of purchase;
 - d. The year of installation;
 - e. The ignition type (i.e., spark or compression);
 - f. The type of fuels burned;
 - g. The maximum capacity output (in horsepower and kilowatts);
 - h. Cylinder displacement (in liters per cylinder);
 - i. The number of hours of operation in 2012, 2013, and 2014;
 - j. Indicate if the engine is an emergency engine;
 - k. The certificate of conformity; and
 - l. A photo of the "emission control information label," which is different from the engine nameplate, but also will be affixed to the engine.
2. Provide a copy of any test report from emissions testing conducted on any engine.

Be aware that if Shelburne Limestone does not provide the information required in this Reporting Requirement in a timely manner, EPA may order it to comply and may assess monetary penalties under Section 113 of the Clean Air Act. Federal law also establishes criminal penalties for providing false information to EPA. This letter is not subject to Office of Management and Budget review pursuant to the Paperwork Reduction Act, 44 U.S.C. Chapter 35.

You may assert a business confidentiality claim covering part or all of the information requested, in the manner described by 40 CFR § 2.203(b). Information covered by such a claim will be disclosed by EPA only to the extent, and by means of the procedures, set forth in 40 CFR Part 2, Subpart B. Note that certain categories of information, such as emission data, are not properly the subject of such a claim. If no such claim accompanies the information when EPA receives it, EPA may make the information available to the public without further notice to you.

Provide the above-required information to:

Susan Studlien
US EPA Region 1
Mail Code OES04-2
5 Post Office Square Suite 100
Boston, Massachusetts, 02109-3912
Attn: Abdi Mohamoud

If you have any questions regarding this Reporting Requirement, please contact Abdi Mohamoud at (617) 918-1858, or have your attorney call Tom Olivier at (617) 918-1737.

Sincerely,

A handwritten signature in cursive script that reads "Susan Studlien".

Susan Studlien, Director
Office of Environmental Stewardship

Cc: John Wakefield, VT DEC

Attachments